



*Consulting Engineers
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April 9, 2010
(PBW Project No. 1584)

VIA COURIER

Mr. Gary Miller
Superfund Division, Region 6 (6SF-RA)
Arkansas/Texas Section
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: March 2010 Monthly Status Report, Gulfco Marine Maintenance Site, Freeport, Texas

Dear Mr. Miller:

Pursuant to Section XII, Paragraph 53 of the amended Unilateral Administrative Order (UAO) for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW) has prepared this monthly status report on behalf of the Respondents LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow). As discussed in our telephone conversation on August 2, 2005, monthly status reports for a given month will be submitted by the 15th of the following month as required in Paragraph 53 of the UAO, rather than by the 10th of the following month as indicated in Appendix 1 of the Statement of Work (SOW) attached to the UAO. In accordance with the UAO requirements this report addresses the topics listed below:

1. Actions which have been taken toward achieving compliance with the UAO during the previous month – The following actions were taken during the previous month:
 - Risk Assessment activities (SOW Paragraph 37) detailed under Task 7 of the RI/FS Work Plan, including: (1) preparation of revised text (submitted on March 31, 2010) for the February 8, 2010 Final Baseline Human Health Risk Assessment Report (BHHRA) based on EPA's approval with modifications letter dated March 5, 2010; (2) preparation of a Final Screening-Level Ecological Risk Assessment (SLERA) Report (submitted on March 11, 2010) based on EPA comments on a December 22, 2009 revision of that document as provided in your letter dated February 24, 2010; (3) preparation of a Draft Baseline Ecological Risk Assessment (BERA) Problem Formulation (PF) Report (submitted on March 11, 2010), based on EPA's February 24, 2010 comments; and (4) preparation of a Draft BERA Work Plan and Sampling and Analysis Plan (WP/SAP)(submitted on March 11, 2010), also based on EPA's February 24, 2010 comments.
2. Results of sampling, tests, modeling and all other data (including raw data) received or generated by or on behalf of Respondents during the previous month – No new data were received or generated during the previous month.

3. Actions, data and plans which are scheduled for the next two months and other information relating to the progress of work – The following actions are planned for the next two months:
 - Risk Assessment activities (SOW Paragraph 37) detailed under Task 7 of the RI/FS Work Plan – pending EPA review of the Final SLERA report, Draft BERA PF report and Draft BERA WP/SAP: (1) preparation of modifications to the Final SLERA Report; (2) preparation of a Final BERA PF Report; and (3) preparation of a Final BERA WP/SAP.
4. Information regarding percentage of completion, all delays encountered or anticipated that may affect the future schedule for completion of the work required, and efforts made to mitigate those delays or anticipated delays – RI/FS activities are approximately 80% complete.

Although not required by the UAO, the Respondents listed above have been working with EPA to finalize an Administrative Settlement Agreement and Order on Consent for Removal Action (Removal Action AOC). A revised Draft Work Plan for that Removal Action was submitted to you on March 29, 2010. The above Respondents intend to perform sampling of the tank contents in anticipation of the Removal Action as discussed with you in a telephone conversation on March 22, 2010 and confirmed by a letter dated March 30, 2010. Based on the timing for finalization of the Removal Action AOC, other activities beyond the tank sampling work described in the March 30, 2010 letter may be performed during the next two months.

Thank you for the opportunity to submit this status report. Should you have any questions, please do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC



Eric F. Pastor, P.E.
Principal Engineer

cc: Mr. Doug McReynolds – EA Engineering, Science and Technology
Ms. Luda Voskov – Texas Commission on Environmental Quality
Mr. Ray Merrell – Sequa Corporation
Mr. Brent Murray – Environmental Quality, Inc.
Mr. Donnie Belote - The Dow Chemical Company
Mr. Allen Daniels - LDL Coastal Limited, LP
Mr. F. William Mahley - Strasburger & Price, LLP
Mr. James C. Morriss III - Thompson & Knight, LLP
Ms. Elizabeth Webb - Thompson & Knight, LLP